

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON

AURORA FINANCIAL GROUP, INC.,

Plaintiff,

vs.

MARY K TOLLEFSON; MORTGAGE
ELECTRONIC REGISTRATION SYSTEMS,
INC., OCCUPANTS OF THE PROPERTY,

Defendants.

Case No.: No. 2:20-cv-00297-JLR

JOINT STIPULATION AND ORDER TO
CONTINUE TIME FOR INITIAL
DISCLOSURES

MARY K. TOLLEFSON

Counter-Plaintiff,

vs.

AURORA FINANCIAL GROUP, INC.,

Counter-Defendants.

And

FREEDOM MORTGAGE CORP.,
MCCARTHY & HOLTHUS LLP.,

Third-Party Defendants.

IT IS HEREBY STIPULATED BY AND BETWEEN ALL PARTIES AS
FOLLOWS:

1 Counter-Plaintiff Mary K. Tollefson (“Plaintiff”), and Third-Party Defendant McCarthy
2 & Holthus LLP (the “MH”) (collectively, the “Parties”), by and through their respective counsel
3 of record, hereby respectfully apply to this Court for an Order continuing the date for M&H to
4 submit Initial Disclosures pursuant to Federal Rule of Civil Procedure (“FRCP”) 26(a)(1) until
5 45 days after the Court files its ruling on MH’s Motion to Dismiss.

6 WHEREAS, on April 14, 2020, MH filed a motion to dismiss all claims against M&H in
7 this action pursuant to FRCP Rule 12(b)(6) (“Motion to Dismiss”);

8 WHEREAS, the Motion to Dismiss is scheduled for hearing on June 5, 2020;

9
10 WHEREAS, the Parties met and conferred pursuant to FRCP Rule 26(f) on May 26,
11 2020, to consider the nature and basis of the claims and defenses, the possibilities for promptly
12 settling or resolving the case; making or arranging for the disclosures required by FRCP Rule
13 26(a)(1), discussing any issues about preserving discoverable information, and developing a
14 proposed discovery plan;

15 WHEREAS, the Parties’ Initial Disclosures, pursuant to FRCP Rule 26(a)(1), and the
16 Court’s Order at Docket No. 21, are currently due on May 26, 2020;

17
18 WHEREAS, Ms. Tollefson provided M&H with her initial disclosure on May 26, 2020,
19 however, the Parties have agreed that postponing M&H’s Initial Disclosure deadline until a date
20 after this Court rules on the pending Motion to Dismiss would allow the Parties to avoid
21 potentially unnecessary litigation costs;

22 NOW THEREFORE, IT IS HEREBY STIPULATED, between the Parties, subject to this
23 Court’s approval, that: the last date for the Parties to serve Initial Disclosures pursuant to FRCP
24 Rule 26(a)(1), be continued until forty-five (45) days following service of notice of this Court’s
25 ruling on the Motion to Dismiss.
26

IT IS SO STIPULATED

Dated: May 26, 2020

McCarthy & Holthus, LLP

/s/ Warren Lance

Warren Lance WSBA No. 51586

Dated: May 26, 2020

The Law Office of Arthur Ortiz

/s/ Arthur Ortiz

Arthur E. Ortiz WSBA No. 26676
Attorney for Mary K. Tollefson

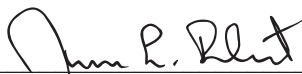
ORDER

For good cause shown, the above Stipulation is adopted as follows:

The last date for M&H to submit Initial Disclosures pursuant to FRCP Rule 26(a)(1) is hereby continued until forty-five (45) days after service of notice of the Court's ruling on MH's Motion to Dismiss.

IT IS SO ORDERED.

Dated: June 1, 2020


JAMES L. ROBART
UNITED STATES DISTRICT JUDGE